The Tedeschi Law Firm, P.A. 1422 Laurel Street Columbia, South Carolina 29201

DEBRA SHERMAN TEDESCHI*

*Also admitted in PA

January 31, 2011

VIA E-FILING

The Honorable Jocelyn Boyd Chief Clerk/Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, SC 29210

RE: CMC Steel - South Carolina

Petition of South Carolina Electric & Gas Company for Updates and Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina – Docket No. 2010-376-E

Dear Ms. Boyd:

Enclosed for filing please find the *Petition to Intervene of CMC Steel South Carolina* in the above-referenced matter. By copy of this letter, I am serving all parties of record. If you have any questions relating to the enclosed please do not hesitate to contact me.

Thank you for your assistance with this matter.

Sincerely yours,

Debra S. Tedeschi

Testesch.

Enclosures

cc: Damon E. Xenopoulos, Esq.

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Petition of South Carolina Electric & Gas)	
Company for Updates and Revisions to)	
Schedules Related to the Construction of a)	Docket No. 2010-376-E
Nuclear Base Load Generation Facility at)	
Jenkinsville, South Carolina)	

PETITION TO INTERVENE OF CMC STEEL SOUTH CAROLINA

CMC Steel South Carolina ("CMC") hereby petitions to intervene in the above-captioned proceeding. CMC states the following grounds in support of its petition.

- This facility utilizes an electric arc furnace ("EAF") to melt and recycle steel. This process requires CMC to purchase very large quantities of electricity from South Carolina Electric & Gas Company ("SCE&G") at a cost of millions of dollars a year. Because the cost of electricity is one of the major costs of steel-making utilizing an EAF, the cost of electric power directly affects CMC's ability to produce steel at a competitive price. CMC is one of the largest retail customers of SCE&G.
- 2) Due to the magnitude and unique characteristics of its load, CMC cannot be adequately represented by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.
 - 3) CMC's mailing address is:

CMC Steel South Carolina 310 New State Road Cayce, SC 29033

4) CMC is represented by the Washington, D.C. law firm of Brickfield, Burchette, Ritts & Stone, P.C. in various matters regarding electric rates and service. In the past few years,

attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804 S.(1)(b) of the Commission's Rules of Practice and Procedure, Brickfield, Burchette, Ritts & Stone, P.C. will associate with Debra Sherman Tedeschi of The Tedeschi Law Firm, P.A., 1422 Laurel Street, Columbia, SC 29201, local counsel licensed to practice in South Carolina. Service and correspondence regarding this proceeding should be sent to all of the undersigned.

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

Damon E. Xenopoulos, Esq.

BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.

1025 Thomas Jefferson Street, N.W.

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Washington, D.C. 20007

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Attorneys for CMC Steel South Carolina

BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

Docket No. 2010-376-E

Petition of South Carolina Electric &)	
Gas Company for Updates and Revisions)	
to Schedules Related to the Construction)	CERTIFICATE OF SERVICE
of a Nuclear Base Load Generation)	
Facility at Jenkinsville, South Carolina)	

This is to certify that I have caused to be served this 3 day of January, 2011 a copy of the Petition to Intervene of CMC Steel South Carolina via first-class mail, postage pre-paid, to the persons named below at the addresses set forth below:

Belton T. Zeigler Lee Dixon Pope Zeigler, LLC P.O. Box 11509 Columbia, SC 29211

K. Chad Burgess South Carolina Electric & Gas Company MC C222 220 Operation Way Cayce, SC 29033-3701

Mitchell M. Willoughby Willoughby & Hoefer, P.A. P.O. Box 8416 Columbia, SC 29202-8416 Jeffrey M. Nelson Nanette S. Edwards, Counsel Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201

Scott Elliott Elliott & Elliott, P.A. 1508 Lady Street Columbia SC 29201

Debra Sherman Tedeschi

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